

EXHIBIT 16

HIGHLY CONFIDENTIAL - AL-KOFAHI

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE
CENTRE GMBH AND WEST C.A. No.
PUBLISHING CORPORATION,

Plaintiffs/Counterdefendants,

vs.

ROSS INTELLIGENCE INC.,

Defendants/Counterclaimant.

HIGHLY CONFIDENTIAL

VIDEOTAPED DEPOSITION OF KHALID AL-KOFAHI

FRIDAY, APRIL 8, 2022

REGUS

90 CANAL STREET, 4TH FLOOR

BOSTON, MA 02114

Reported by: Teri C. Gibson, CSR, RPR, CCR

Job #: 208933

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Deposition of KHALID AL-KOFAHI, held
at REGUS, 90 Canal Street, 4TH Floor, Boston, MA,
pursuant to Notice, before Teri C. Gibson, a
Shorthand Reporter, Registered Professional
Reporter, and Notary Public in and for the
Commonwealth of Massachusetts.

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A P P E A R A N C E S

KIRKLAND & ELLIS

ATTORNEYS FOR PLAINTIFFS/COUNTERDEFENDANTS

BY: ERIC LOVERRO, ESQ.

MIRANDA MEANS, ESQ.

601 Lexington Avenue

New York, New York 10022

CROWELL & MORING

ATTORNEYS FOR DEFENDANTS/COUNTERCLAIMANT

BY: GABRIEL RAMSEY, ESQ.

3 Embarcadero Center

San Francisco, California 94111

ALSO PRESENT:

Adam Cerro, Videographer

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I N D E X

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By Mr. Ramsey	7
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1 HIGHLY CONFIDENTIAL - AL-KOFAHI

2 P R O C E E D I N G S

3 VIDEOGRAPHER: One moment, please.

4 Good morning. We are on the record.

5 This is videographer Adam Cerro with
6 TSG Reporting. Today's date is April 8, 2022,
7 and the time is 9:41 a.m.

8 We are here in 90 Canal Street, Fourth
9 Floor, Boston, Massachusetts, to take the video
10 deposition of Khalid Al-Kofahi in the matter of
11 Thomson Reuters Enterprise Centre GMBH, et al. v.
12 Ross Intelligence, Inc.

13 Would counsel please introduce
14 themselves for the record.

15 MR. RAMSEY: This is Gabriel Ramsey of
16 Crowell & Moring for the defendant, Ross
17 Intelligence, and also joined by my colleague,
18 Kevin Cacabelos.

19 MR. LOVERRO: This is Eric Loverro from
20 Kirkland & Ellis on behalf of plaintiffs, Thomson
21 Reuters Enterprise Centre and West Publishing
22 Corporation, and with me is my colleague, Miranda
23 Means.

24 THE VIDEOGRAPHER: Thank you.

25 Would the court reporter, Teri Gibson,

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please swear in the witness.

(Witness sworn.)

THE WITNESS: Yes.

THE COURT REPORTER: Counsel, you may
begin.

KHALID AHMAD AL-KOFAHI

EXAMINATION

BY MR. RAMSEY:

Q. All right. Good morning, Mr. Al-Kofahi.

So have you ever had your deposition taken
before?

A. No. My first time.

Q. Okay. So it's questions and answers. I
will ask you questions, appreciate you giving, if you
can, full and capable answers; can we agree on that?

A. Yes. I'm sorry. Just speak a little bit
louder.

Q. Oh, sure.

A. Yeah, yeah. I'm losing my hearing here at
the same time.

Q. No, no, no. Thank you for telling me.

So the most important thing is that we try
not to talk over each other; that's always the
challenge. So let me finish my questions before you

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C E R T I F I C A T E

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

I, TERI CELESTE GIBSON, a CSR, RPR, CRR, and a
Notary Public within and for the Commonwealth of
Massachusetts do hereby certify:

In the 8th day of April, 2022, before me, the
undersigned Notary Public, personally appeared KHALID
AHMAD AL-KOFAHI, who proved to me through satisfactory
evidence of identification, which was a MASSACHUSETTS
DRIVER'S LICENSE; that the witness whose testimony is
hereinbefore set forth, was duly sworn by me, and that
such testimony is a true and accurate record of my
stenotype notes taken in the foregoing matter, with use of
mechanical stenography, computer aided transcription, to
the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand
this 21st day of April, 2022.


TERI CELESTE GIBSON, CSR, RPR, CRR

Notary Public - My Commission Expires: 2/7/2025

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

THOMSON REUTERS ENTERPRISE CENTRE
GMBH and WEST PUBLISHING
CORPORATION,

C.A. No. 20-613-LPS

Plaintiffs, Counterdefendants,

v.

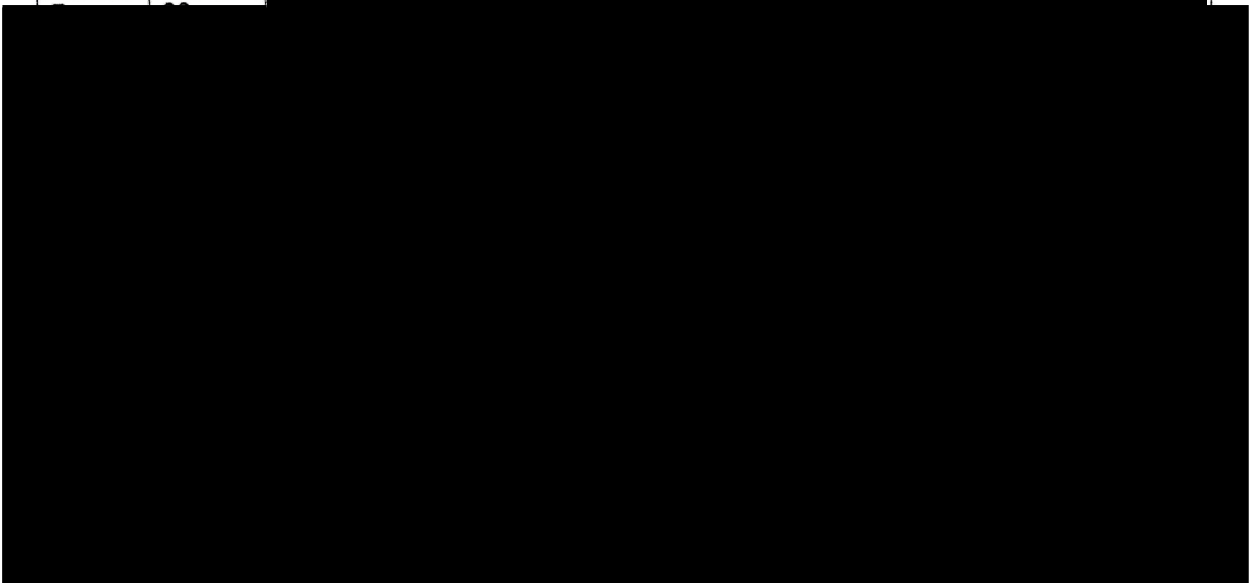
ROSS INTELLIGENCE INC.,

Defendant, Counterclaimant.

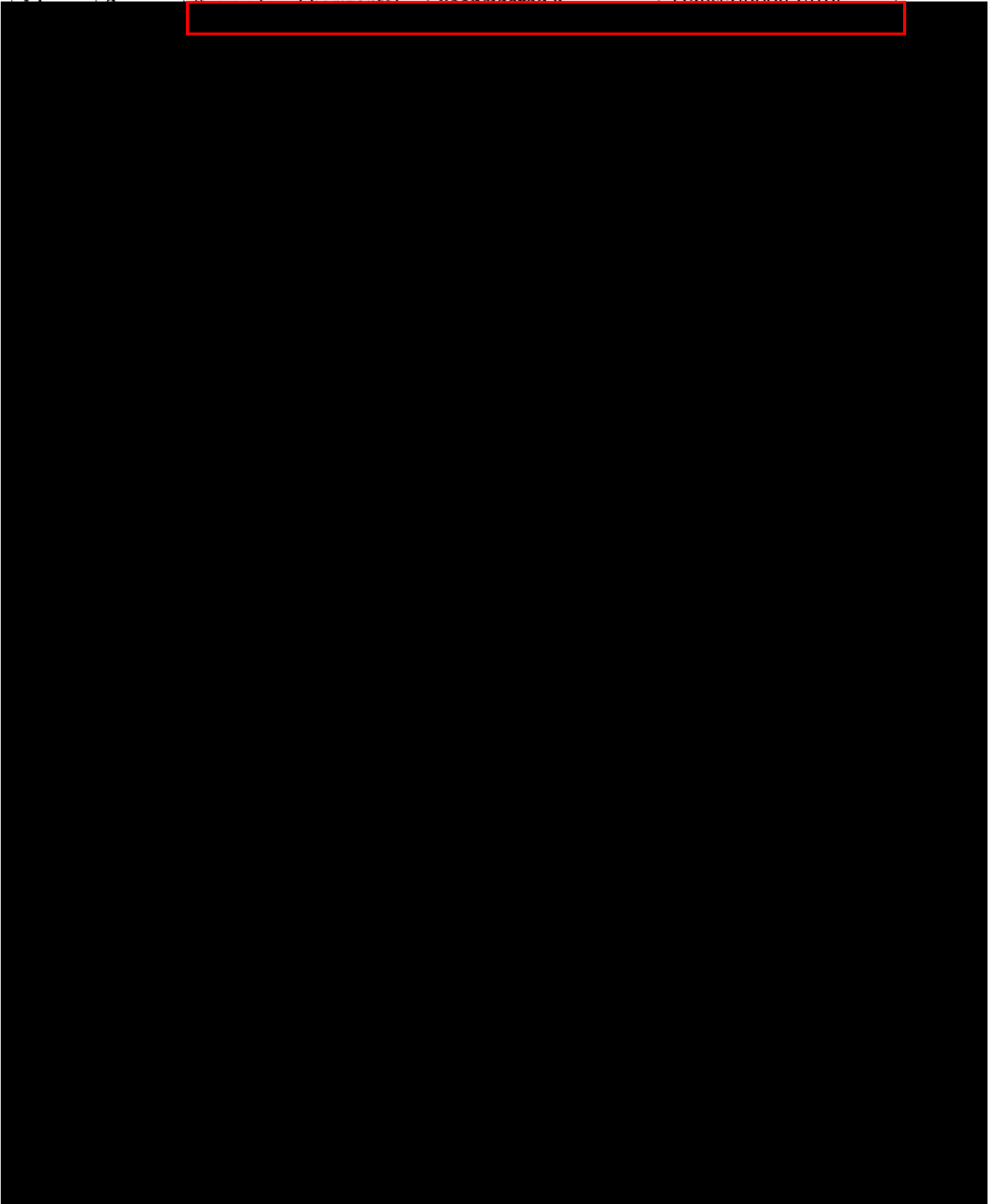
**PLAINTIFFS THOMSON REUTERS ENTERPRISE CENTER GMBH
AND WEST PUBLISHING CORPORATION'S NOTICE OF ERRATA
FOR THE DEPOSITION OF KHALID AL-KOFAHI**

I, the undersigned, do hereby declare that I read the deposition transcript of Khalid Al-Kofahi dated April 8, 2022 and that to the best of my knowledge, said testimony is true and accurate, with the exception of the following changes listed below:

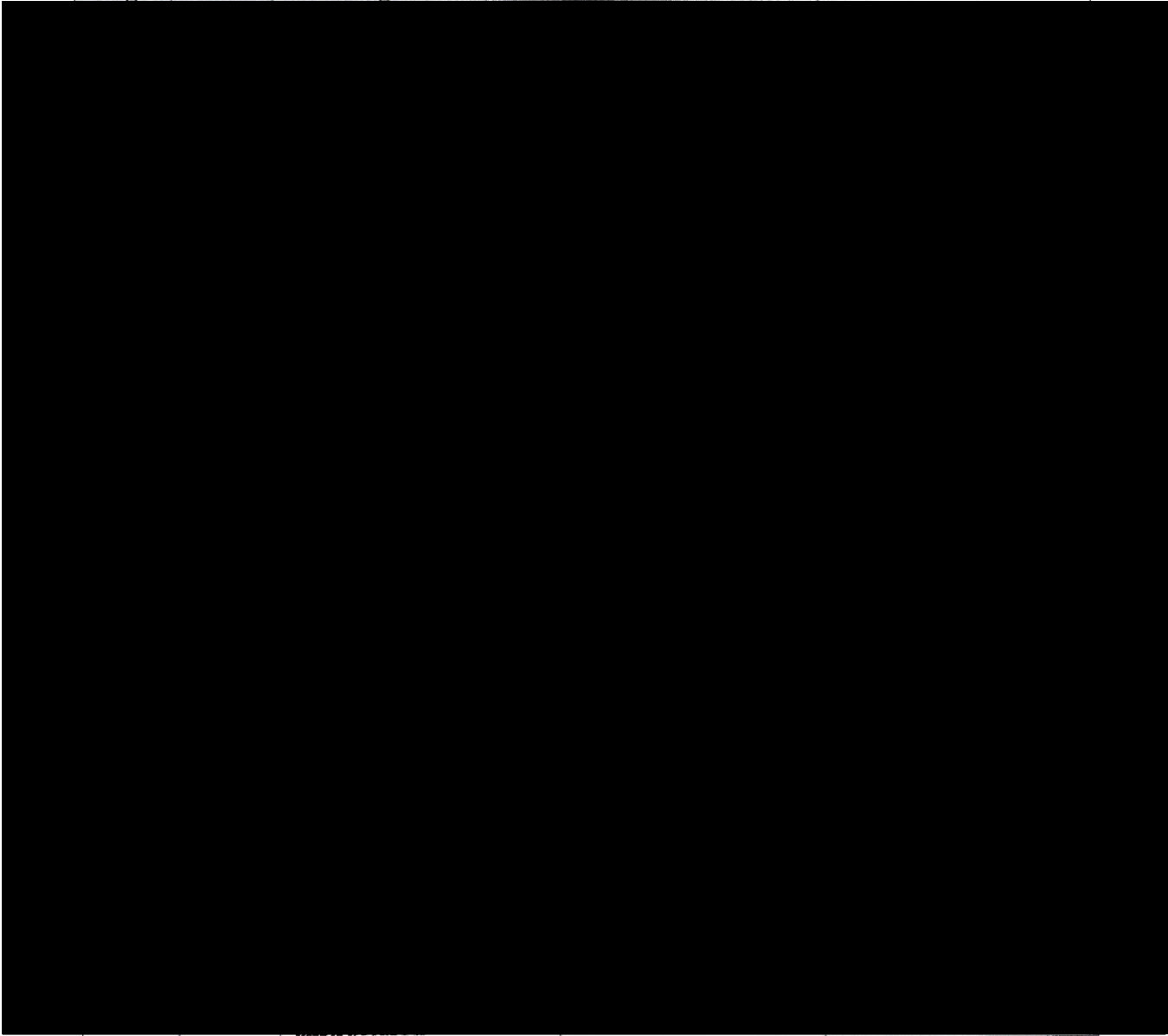
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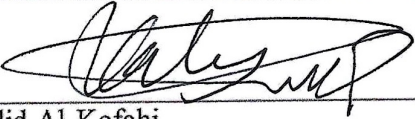
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11	8	"...it is not a"	"...considered a"	Transcription Error



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Dated: May 31, 2022


Khalid Al-Kofahi